


Exhibit R-2

 Outlook

Plaintiff's Position Regarding CMC and Rule 37 Motion

From L P <lhkc_25@outlook.com>

Date Fri 5/30/2025 4:15 AM

To Kimberly.Pallen@withersworldwide.com <Kimberly.Pallen@withersworldwide.com>

Dear Ms. Pallen,

- 1, Plaintiff's position has already been clearly stated in the unilateral case management statement submitted on April 29, 2025.
- 2, Plaintiff has repeatedly informed Defendants that she does not consent to any postponement of the Case Management Conference.
- 3, Defendants failed to make any disclosures as required under Rules 34 and 26 by the May 6, 2025 deadline, and did not participate in the required Rule 26(f) conference. Despite this, Defendants have filed a motion to dismiss and a motion to stay discovery, and are now threatening to move to postpone the Case Management Conference on the eve of the filing deadline. As a result, Plaintiff is left with no choice but to file a Rule 37(a) motion to compel disclosure within the coming week, in order to preserve procedural integrity and prevent further delay.

Sincerely,

Lianlian Porth